



LEWELT-PACKARD COMPANY
Intellectual Property Administration
P.O. Box 272400
Fort Collins, Colorado 80527-2400

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PATENT APPLICATION

ATTORNEY DOCKET NO. 200208087-1

IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Brian James DeHamer

Confirmation No.: 2983

Application No.: 10/652,988

Examiner: Vo, Ted T.

Filing Date: August 29, 2003

Group Art Unit: 2191

Title: WEB PRESENTATION ARCHITECTURE THAT SUPPORTS PAGE NAVIGATION MANAGEMENT

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TRANSMITTAL OF APPEAL BRIEF

Transmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on August 31, 2007.

- The fee for filing this Appeal Brief is \$510.00 (37 CFR 41.20).
 No Additional Fee Required.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

- (a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d)) for the total number of months checked below:

1st Month \$120 2nd Month \$460 3rd Month \$1050 4th Month \$1640

- The extension fee has already been filed in this application.
 (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account 08-2025 the sum of \$ 510. At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees.

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Respectfully submitted,

By Barry D. Blount

Barry D. Blount

Attorney/Agent for Applicant(s)

Reg No. : 35,069

Date : October 31, 2007

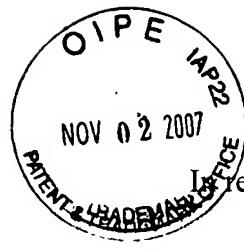
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application of:

Brian James DeHamer et al.

Serial No.: 10/652,988

§ Group Art Unit: 2191
§ Confirmation No.: 2983

Filed: August 29, 2003

§ Examiner: Vo, Ted T.

For: Web Presentation Architecture that
Supports Page Navigation Management

§ Atty. Docket: 200208087-1
§ NUHP:0126/BLT/GIL

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October 31, 2007

Date

Eddie Lou Robinson

APPEAL BRIEF PURSUANT TO 37 C.F.R. §§41.31 AND 41.37

This Appeal Brief is being filed in furtherance to the Notice of Appeal mailed on August 27, 2007, and received by the Patent Office on August 31, 2007.

The Commissioner is authorized to charge the requisite fee of \$510.00, and any additional fees which may be necessary to advance prosecution of the present application, to Account No. 08-2025, Order No. 200208087-1.

1. **REAL PARTY IN INTEREST**

The real party in interest is Hewlett-Packard Development Company, L.P., the Assignee of the above-referenced application by virtue of the Assignment recorded at reel 014466, frame 0469, and dated August 29, 2003. Accordingly, Hewlett-Packard Development Company, L.P. will be directly affected by the Board's decision in the pending appeal.

2. **RELATED APPEALS AND INTERFERENCES**

Appellants are unaware of any other appeals or interferences related to this Appeal. The undersigned is Appellants' legal representative in this Appeal.

3. **STATUS OF CLAIMS**

Claims 1-20 are currently pending, are currently under final rejection and, thus, are the subject of this Appeal.

4. **STATUS OF AMENDMENTS**

There are no outstanding amendments to be considered by the Board.

5. **SUMMARY OF CLAIMED SUBJECT MATTER**

The present invention relates generally to the field relate of web applications. Specifically, the application is directed to systems and method for conveniently managing and handling content and functionalities of web applications. *See, Application, Abstract* and paragraph 2.

The Application contains four (4) independent claims, namely, claims 1, 8, 15 and 18, all of which are the subject of this Appeal. The subject matter of these claims is summarized below.

With regard to the aspect of the invention set forth in independent claim 1, discussions of the recited features of claim 1 can be found at least in the below cited locations of the specification and drawings. By way of example, exemplary embodiments of claim 1 provide a system for creating web applications, whereby the system comprises a controller generator (e.g., 102) that is adapted to provide a web application (e.g., 20) with a controller (e.g., 18) that receives requests (e.g., 148) for data from users (e.g., 14) and responds to the requests by obtaining requested data. *See, e.g., id.* at paragraphs 9 and 17-21; *see also* FIGS. 1 and 2. The system further comprises a navigation manager generator (e.g., 102) that is adapted to provide a navigation manager (e.g., 108) that saves a user's (e.g., 14) intended destination and subsequently recalls that information to redirect the user back to the intended destination upon completion of a prerequisite. *See, e.g., id.* at paragraphs 17, 25, 33 and 35-37; *see also* FIGS. 1-3.

With regard to the aspect of the invention set forth in independent claim 8, discussions of the recited features of claim 8 can be found at least in the below cited locations of the specification and drawings. By way of example, exemplary embodiments of claim 8 provide a method of creating web applications comprising

creating, with a processor-based device (e.g., 100), a controller (e.g., 18) that receives requests (e.g., 148) for data from users (e.g., 14) and responds to the requests by obtaining requested data. *See, e.g., id.* at paragraphs 9 and 17-21; *see also* FIGS. 1 and 2. The method further comprises providing a navigation manager (e.g., 108) adapted to save a user's (e.g., 14) intended destination and subsequently recall that information to redirect the user back to the intended destination upon completion of a prerequisite. *See, e.g., id.* at paragraphs 17, 25, 33 and 35-37; *see also* FIGS. 1-3.

With regard to the aspect of the invention set forth in independent claim 15, discussions of the recited features of claim 15 can be found at least in the below cited locations of the specification and drawings. By way of example, exemplary embodiments of claim 15 provide a system for creating web applications comprising means (e.g., 102) for creating a controller (e.g., 18) that provides control functions for a web application (e.g., 20), the controller being adapted to receive requests (e.g., 148) for data from users (e.g., 14) and respond to the requests by obtaining requested data. *See, e.g., id.* at paragraphs 9 and 17-21; *see also* FIGS. 1 and 2. The system further comprises means (e.g., 108) for setting navigational rules (e.g., 202), enabling the web application to save a user's (e.g., 14) intended destination and subsequently recall that information to redirect the user back to the intended destination. *See, e.g., id.* at paragraphs 17, 25, 33 and 35-37; *see also* FIGS. 1-3.

With regard to the aspect of the invention set forth in independent claim 18, discussions of the recited features of claim 18 can be found at least in the below cited locations of the specification and drawings. By way of example, exemplary embodiments of claim 18 provide a tangible machine readable medium (e.g., 100) comprising code that is adapted to save a user's (e.g., 14) intended destination and subsequently recall that information to redirect the user back to the intended destination upon completion of the prerequisite. *See, e.g., id.* at paragraphs 10, 17, 25, 33 and 35-37; *see also* FIGS. 1-3.

6. **GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

First Ground of Rejection for Review on Appeal:

Appellants respectfully urge the Board to review and reverse the Examiner's first ground of rejection in which the Examiner rejected claims 18-20 under 35 U.S.C. §101 as being directed to non-statutory subject matter.

Second Ground of Rejection for Review on Appeal:

Appellants respectfully urge the Board to review and reverse the Examiner's second ground of rejection in which the Examiner rejected claims 18-20 under 35 U.S.C. § 112, First Paragraph, as not supporting a specific or a well established utility.

Third Ground of Rejection for Review on Appeal:

Appellants respectfully urge the Board to review and reverse the Examiner's third ground of rejection in which the Examiner rejected claims 18-20 under 35 U.S.C. § 112, Second Paragraph, as being indefinite to particularly point out and distinctly claim the subject matter which Appellants regard the invention.

Fourth Ground of Rejection for Review on Appeal:

Appellants respectfully urge the Board to review and reverse the Examiner's fourth ground of rejection in which the Examiner rejected claims 1-20 under 35 U.S.C. § 102(b) as being anticipated by "WebSplitter: A Unified XML Framework for Multi-Device Collaborative Web Browsing", ACM, 2000, to Han et al., (hereinafter "the Han reference").

7. **ARGUMENT**

As discussed in detail below, the Examiner has improperly rejected the pending claims. Further, the Examiner has misapplied long-standing and binding legal precedents and principles in rejecting the claims under Sections 101, 112 and 102. Accordingly, Appellants respectfully request full and favorable consideration by the Board, as Appellants respectfully assert that claims 1-20 are currently in condition for allowance.

A. **Ground of Rejection No. 1:**

With respect to the rejection of claims 18-20 under Section 101, the Examiner stated that:

The invention is “not supported by either a specific asserted utility or well established utility. The specification does not describe or include any utility for a claimed subject matter in claims 18-20.”

See, Final Office Action, page 4.

Appellants respectfully traverse the rejection.

The Appellants respectfully assert that the present claims are directed to statutory subject matter. Any analysis of whether a claim is directed to statutory subject matter begins with the language of 35 U.S.C. §101, which reads:

Whoever invents or discovers any new and useful process, machine, manufacture, or composition of matter, or any new and useful improvement thereof, may obtain a patent therefore, subject to the conditions and requirements of this title.

In interpreting Section 101, the Supreme Court stated that Congress intended statutory subject matter to “include *anything* under the sun that is made by man.” *Diamond v. Chakrabarty*, 447 U.S. 303, 309, 206 U.S.P.Q. 193, 197 (1980) (emphasis added). Although this statement may appear limitless, the Supreme Court has identified three categories of unpatentable subject matter: laws of nature, natural phenomena, and abstract ideas. *See, Diamond v. Diehr*, 450 U.S. 175, 182, 209 U.S.P.Q. 1, 7 (1981). Accordingly, so long as a claim is not directed to one of the three specific areas listed

above, the claim is directed to patentable subject matter. Thus, it is improper to read restrictions into Section 101 regarding subject matter that may be patented where the legislative history does not indicate that Congress clearly intended such limitation. *In re Alappat*, 31 U.S.P.Q.2d 1545, 1556 (Fed. Cir. 1994) (citing *Chakrabarty* 447 U.S. at 308).

For example, the fact that a claim includes or is directed to an algorithm is no ground for holding a claim is directed to non-statutory subject matter. *See, In re Iwashashi*, 12 U.S.P.Q.2d 1908, 1911 (Fed. Cir 1989). Rather, the proscription against patenting an algorithm, to the extent it still exists, is narrowly limited to *mathematical algorithms in the abstract*, e.g., describing a mathematical algorithm as a procedure for solving a given type of mathematical problem. *See, AT&T Corp. v. Excel Communications, Inc.*, 50 U.S.P.Q.2d 1447, 1450 (Fed. Cir 1999). Indeed, the courts are aware that any step-by-step process, be it electronic, chemical, or mechanical, involves an algorithm. *Id.* at 1450.

Thus, inquiry into what is statutory subject matter simply requires “an examination of the contested claims to see if the claimed subject matter as a whole is a disembodied mathematical concept representing nothing more than a ‘law of nature’ or an ‘abstract idea, or if the mathematical concept has been reduced to some practical application rendering it ‘useful’” *Id.* at 1451 (citing and quoting *In re Alappat*, 31 U.S.P.Q.2d at 1557). Furthermore, a Section 101 analysis “demands that the focus in any

statutory subject matter analysis be on the *claim as a whole.*" *In re Alappat*, 31 U.S.P.Q.2d at 1557 (citing *Diehr*, 450 U.S. at 192) (emphasis in original). Indeed, the dispositive inquiry is whether the claim *as a whole* is directed to statutory subject matter, it is irrelevant that a claim may contain, as part of the whole, subject matter that would not be patentable by itself. *Id.*

The Appellants respectfully disagree with the Examiner's assertions and interpretation of the law. Indeed, the systems recited in independent claims 18-20 are clearly useful for "creating web applications" and are fully supported by the specification, as set forth below with regard to the rejection of the claims under Section 112, second paragraph. This is all the law requires in order to comply with Section 101. Accordingly, Appellants submit that independent claims 18-20 are directed to statutory subject matter.

Appellant further submit that particularly with regard to computer programs, if they are in a tangible medium, they are considered patentable subject matter under Section 101. See *In re Beauregard*, 53 F.3d 1583 (Fed Cir. 1995). Indeed, in *Beauregard*, the Commissioner of Patents is quoted as stating, "[C]omputer programs embodied in a tangible medium...are patentable subject matter under 35 U.S.C. §101." *Id.* Accordingly, because independent claims each recite, *inter alia*, "A tangible machine readable medium comprising code," Appellants assert that claims 18-20 are

directed to patentable subject matter under 35 U.S.C. §101. As such, Appellants respectfully request the Board to reverse the rejection of claims 18-20 under Section 101.

B. **Ground of Rejection No. 2:**

With regard to the Examiner's rejection of claims 18-20 under 35 U.S.C. §112, First Paragraph, the Examiner asserted that:

... since the claimed invention is not supported by either a specific asserted utility or a well established utility for the reasons set forth above, one skilled in the art clearly would not know how to use the claimed invention.

See, Final Office Action, page 4.

Appellants respectfully traverse the rejection.

1. **Legal Precedent**

First, regarding the written description requirement, the initial burden of proof regarding the sufficiency of the written description falls on the Examiner. Accordingly, the Examiner must present evidence or reasons why persons skilled in the art would not recognize a description of the claimed subject matter in the applicant's disclosure. *In re Wertheim*, 541 F.2d 257, 262, 191 U.S.P.Q. 90, 96 (CCPA 1976). The Examiner is also reminded that the written description requirement does not require the claims to recite the same terminology used in the disclosure. The patentee may be his own lexicographer.

Ellipse Corp. v. Ford Motor Co., 171 U.S.P.Q. 513 (7th Cir. 1971), *aff'd*. 613 F.2d 775 (7th Cir. 1979), *cert. denied*, 446 U.S. 939 (1980). Moreover, any information contained in any part of the application as filed, including the specification, claims and drawings,

may be added to other portions of the application without introducing new matter.

Accordingly, if an application as originally filed contains a claim disclosing material not disclosed in the remainder of the specification, the applicant may amend the specification to include the claimed subject matter. *In re Benno*, 768 F.2d 1340, 226 U.S.P.Q. 683 (Fed. Cir. 1985).

Second, regarding the enablement requirement, the Examiner has the initial burden to establish a *reasonable basis* to question the enablement provided for the claimed invention. *In re Wright*, 999 F.2d 1557, 1562, 27 U.S.P.Q.2d 1510, 1513 (Fed. Cir. 1993). The test for enablement, as set forth by the Supreme Court, is whether the experimentation needed to practice the invention is undue or unreasonable? *Mineral Separation v. Hyde*, 242 U.S. 261, 270 (1916). A patent need not teach, and preferably omits, what is well known in the art. *In re Buchner*, 929 F.2d 660, 661, 18 U.S.P.Q.2d 1331, 1332 (Fed. Cir. 1991). The *undue experimentation* test essentially evaluates whether one of reasonable skill in the art can make or use the invention from the disclosures in the patent coupled with information known in the art without undue experimentation. *U.S. v. Telelectronics, Inc.*, 857 F.2d 778, 785, 8 U.S.P.Q.2d 1217, 1223 (Fed. Cir. 1988). As long as the specification discloses at least one method for making and using the claimed invention that bears a *reasonable correlation* to the entire scope of the claim, then the enablement requirement of section 112 is satisfied. *In re Fisher*, 427 F.2d 833, 839, 166 U.S.P.Q. 18, 24 (C.C.P.A. 1970).

As stated above, the rejections under Section 112, First Paragraph, fail to address whether the Appellants satisfied the written description requirement or the enablement requirement. Moreover, the above rejection under Section 112, First Paragraph, stated by the Examiner addresses neither of these requirements. The Appellants submit that the Examiner has misconstrued Section 112, First Paragraph and, in so doing, asserted an erroneous rejection.

Notwithstanding the deficiency of the rejection, Appellants submit that the specification indeed discloses subject matter, enabling one skilled in the art to use the claimed invention. For example, the specification states that

[0010] The WPA 100 may be configured with a variety of object-oriented programming languages, such as Java by Sun Microsystems, Inc., Santa Clara, California. An object is generally any item that can be individually selected and manipulated. In object-oriented programming, an object may comprise a self-contained entity having data and procedures to manipulate the data. For example, a Java-based system may utilize a variety of JavaBeans, servlets, Java Server Pages, and so forth. JavaBeans are independent, reusable software modules. In general, JavaBeans support introspection (a builder tool can analyze how a JavaBean works), customization (developers can customize the appearance and behavior of a JavaBean), events (JavaBeans can communicate), properties (developers can customize and program with JavaBeans), and persistence (customized JavaBeans can be stored and reused). JSPs provide dynamic scripting capabilities that work in tandem with HTML code, separating the page logic from the static elements. According to certain embodiments, the WPA 100 may be designed according to

the Java 2 Platform Enterprise Edition (J2EE), which is a platform-independent, Java-centric environment for developing, building and deploying multi-tiered Web-based enterprise applications online.

Specification, paragraph 10.

Accordingly, the specification provides the above software tools storable on a tangible machine readable medium for implementing the claimed configurator generator and the claimed navigation manager as part of the WPA 100. Further, the specification specifically outlines code storable and usable with the forgoing software tools for implementing the navigation manager. For instance, in accordance with the techniques disclosed in the application, a navigation file (navigation.xml) is given by the following code:

```
<nav-manager-rules>

    <rule
        portal="itrc"
        path="/ciss/loginRequired.jsp"
        action="push"
        target="/ciss/doLogin.do"/>

    <rule
        portal="itrc"
        path="/ciss/loginSuccess.jsp"
        action="pop" />

</nav-manager-rules>
```

Specification, paragraph 37

Hence, this example illustrates how one skilled in the art may utilize the navigation manager 108 to implement a push rule to save the current request URL if it encounters an action forward 164 containing the path “/ciss/Required.jsp” and the current portal context matches. *See also*, paragraph 38. Accordingly, these examples illustrate that the specification contains sufficient knowledge for one skilled in the art to practice the invention. Accordingly, Appellants request that the Board reverse the Examiner’s rejection of claims 18-20 under Section 112, First Paragraph.

C. **Ground of Rejection No. 3:**

With regard to the Examiner’s rejection of claims 18-20 under 35 U.S.C. § 112, Second Paragraph, the Examiner asserted that:

Claims 18-20 recite ‘a tangible machine readable medium, comprising: code....’. This limitation is indefinite because there is no sufficient antecedent basis in the specification. Furthermore, ‘a medium comprising code’ is unclear. It should be noted that a medium stores code only.

See, Final Office Action, page 4.

Appellants respectfully traverse the rejection.

1. **Legal Precedent**

Although the Examiner may take exception to the terms used in the claims, the patentee may be his own lexicographer. *Ellipse Corp. v. Ford Motor Co.*, 171 U.S.P.Q. 513 (7th Cir. 1971), *aff’d*. 613 F.2d 775 (7th Cir. 1979), *cert. denied*, 446 U.S. 939 (1980). The Examiner is also reminded not to equate breadth of a claim with indefiniteness. *In re Miller*, 441 F.2d 689, 169 U.S.P.Q 597 (CCPA 1971).

In contrast to the Examiner's assertion, the specification discloses a

WPA 100, which may be adapted to execute on a *processor-based device* such as a computer system or the like, has certain core features of the MVC computing strategy, and various additional features and enhancements to improve its architectural operation and performance.

Application, paragraph 16 (Emphasis added.).

As those skilled in the art would appreciate, a tangible machine readable medium may correspond to one of many components forming the above processor-based device on which the WPA 100 is executed. That is, by virtue of disclosing a processor-based device and additional components, such as an object cache manger, a cookie manager and so forth, the Appellants' specification explicitly, as well as an inherently, teaches a system in which a processor reads code from a tangible machine readable medium. Therefore, Appellants submit that the recitation of a "tangible machine readable medium" clearly has sufficient antecedent basis in the specification. For at least these reasons, the rejection of claims 18-20 under Section 112, Second Paragraph, is erroneous.

Accordingly, Appellants request the Board to reverse the rejection of independent claim 18-20.

D. **Ground of Rejection No. 4:**

With respect to the Examiner's rejection of claims 1-20 under 35 U.S.C. § 102(b) the Examiner's rejections with respect to independent claims 1, 8, 15 and 18 are exemplary:

As per Claim 1: Han et al. discloses, A system for creating web applications, the system comprising: a controller generator that is adapted to provide a web application with a controller ('PROXY') that receives requests for data from users and responds to the requests by obtaining requested data (See Figure 5, PROXY receives request from creator's laptop and send response); and a navigation manager generator ('Lecturer/section creator/XML & Policy file') that is adapted to provide a navigation manager that saves a user intended destination and subsequently recalls that information to redirect the user back to the intended (see Examiner explains in the above argument) upon completion of a prerequisite (p. 226, left col., sec. 3.1: The proxy registers itself (1) to the service discovery database so that a client can find the proxy (2). Next, the session creator clicks on the desired proxy's hyperlink (3) and the proxy returns a session login menu requesting the session name and URL of the first XML Web page (4). Then, the proxy pulls the requested XML page (5) and its associated policy file (6) into the proxy. The proxy parses the XML page and policy file to create privilege groups (7), then sends to the session creator a login menu requesting username and password (8).' (the underscored phase reads prerequisite, because in XML document or HTML document (p.226: left col., first paragraph) this type login menu in a webpage is a tag "form").

As per Claim 8: See rationale addressed in the rejection of claim 1.

As per Claim 15: See rationale addressed in the rejection of Claim 1, especially see sec. 4: Client-Side Functions.

As per Claim 18: Han discloses, See rationale addressed in the rejection of claim 1.

See, Final, Office Action, pp. 5-8.

Appellants respectfully traverse the rejection.

1. **Judicial precedent has clearly established a legal standard for a *prima facie* anticipation rejection.**

Anticipation under Section 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985). Thus, for a prior art reference to anticipate under Section 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). Moreover, the prior art reference also must show the *identical* invention “*in as complete detail as contained in the ... claim*” to support a *prima facie* case of anticipation. *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q. 2d 1913, 1920 (Fed. Cir. 1989) (emphasis added). Accordingly, Appellants need only point to a single element not found in the cited reference to demonstrate that the cited reference fails to anticipate the claimed subject matter.

2. **The Examiner’s rejection of independent claims 1, 8, 15 and 18 is improper because the rejection fails to establish a *prima facie* case of anticipation.**

Independent claim 1 recites:

A system for creating web applications, the system comprising:

a controller generator that is adapted to provide a web application with a controller that receives requests for data from users and responds to the requests by obtaining requested data; and

a navigation manager generator that is adapted to provide a navigation manager that *saves a user’s intended destination and subsequently recalls that information to redirect the user back to the intended destination upon completion of a prerequisite.* (Emphasis added.)

Independent claim 8 recites:

A method of creating web applications, the method comprising:
 creating, with a processor-based device, a controller that receives requests for data from users and responds to the requests by obtaining requested data; and
 providing a navigation manager adapted to *save a user's intended destination and subsequently recall that information to redirect the user back to the intended destination* upon completion of a prerequisite. (Emphasis added.)

Independent claim 15 recites:

A system for creating web applications, the system comprising:
 means for creating a controller that provides control functions for a web application, the controller being adapted to receive requests for data from users and respond to the requests by obtaining requested data; and
 means for setting navigational rules, enabling the web application to *save a user's intended destination and subsequently recall that information to redirect the user back to the intended destination*. (Emphasis added.)

Independent claim 18 recites:

A tangible machine readable medium, comprising:
 code that is adapted to *save a user's intended destination and subsequently recall that information to redirect the user back to the intended destination* upon completion of the prerequisite. (Emphasis added.)

Appellants respectfully submit that the Han reference clearly fails to disclose the above recited subject matter of independent claims 1, 8, 15 and 18. First, the Appellants note that Han discloses a system for creating personalized partial views of the same Web page, based on a user's access privileges (Han et al., page 221). The Examiner points to

Fig. 1 on page 222 of Han as illustrating a “system for creating web applications.”

However, the Han reference states that:

Figure 1 illustrates integrated multi-user multi-device Web browsing. The session presenter in the upper right requests a Web page whose contents are then split to multiple participants in a joint browsing session.

Han, page 222.

In other words, Figure 1 discloses a system for creating different views on multiple output devices. This is completely different from the system for creating web applications recited in the claims above. As will be appreciated by one skilled in the art, independent claims 1, 8, 15, and 18 recite an architecture in which a user’s intended destination is saved so that the user may be redirected to that location after completion of other activities. This is not disclosed by Han. Instead, Han discloses a single application for creating various views of the same document.

Moreover, Han discloses a proxy that pulls a partial view based on specific completion of a prerequisite by a user (i.e. username and password) (Han, page 226). In other words, Han discloses only one intended destination by the user, namely, the partial view corresponding to a specific prerequisite completion. Since the user’s intended destination is the partial view corresponding to the login (prerequisite) that was entered, there is no need to save the user’s intended destination for redirection to another, previous path. Thus, the Han reference fails to disclose a navigation manager that saves a

user's intended destination and is capable of redirecting the user back to the intended destination.

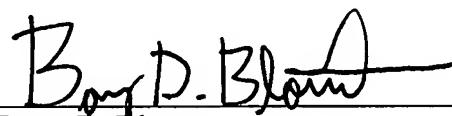
For at least these reasons, Appellants respectfully submit that independent claims 1, 8, 15, and 18 (and the claims dependent thereon) are not anticipated by the Han reference. Accordingly, the Appellants respectfully request the Board to reverse the Examiner's rejection of claims 1-20 under Section 102 based on the Han reference.

Conclusion

Appellants respectfully submit that all pending claims are in condition for allowance. However, if the Examiner or Board wishes to resolve any other issues by way of a telephone conference, the Examiner or Board is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

Date: October 31, 2007


Barry D. Blount
Reg. No. 35,069
FLETCHER YODER

CORRESPONDENCE ADDRESS:
HEWLETT-PACKARD COMPANY
Intellectual Property Administration
PO Box 272400
Fort Collins, Colorado 80527-2400

8. **APPENDIX OF CLAIMS ON APPEAL**

1. A system for creating web applications, the system comprising:
a controller generator that is adapted to provide a web application with a controller that receives requests for data from users and responds to the requests by obtaining requested data; and
a navigation manager generator that is adapted to provide a navigation manager that saves a user's intended destination and subsequently recalls that information to redirect the user back to the intended destination upon completion of a prerequisite.
2. The system set forth in claim 1, wherein the prerequisite comprises a form.
3. The system set forth in claim 1, wherein the prerequisite comprises a user login.
4. The system set forth in claim 1, wherein the prerequisite comprises an access rights verification.
5. The system set forth in claim 1, wherein the navigation manager generator is adapted to identify the prerequisite for the user request.

6. The system set forth in claim 1, wherein the navigation manager generator is adapted to store the user request upon identification of the prerequisite.

7. The system set forth in claim 1, comprising a model object and a view object separate from one another and separate from the controller, wherein the model object is adapted to provide an application state for the web application and the view object is adapted to provide a view presentation for the web application.

8. A method of creating web applications, the method comprising:
creating, with a processor-based device, a controller that receives requests for data from users and responds to the requests by obtaining requested data; and providing a navigation manager adapted to save a user's intended destination and subsequently recall that information to redirect the user back to the intended destination upon completion of a prerequisite.

9. The method set forth in claim 8, comprising providing request tracking logic adapted to track the user request.

10. The method set forth in claim 8, comprising providing navigational rules for a portal name, a first path corresponding to initiation of the prerequisite, and a second path corresponding to completion of the prerequisite.

11. The method set forth in claim 10, comprising setting a first navigational rule to save an intended path corresponding to the user request if a navigational redirection is provided to the first path.

12. The method set forth in claim 11, comprises setting a second navigational rule to recall an intended path corresponding to the user request if a navigational redirection is provided to the second path.

13. The method set forth in claim 8, comprising providing request storage logic adapted to save the user request if subject to the prerequisite.

14. The method set forth in claim 8, comprising providing request recall logic adapted to recall the user request if the prerequisite is complete.

15. A system for creating web applications, the system comprising:
means for creating a controller that provides control functions for a web application, the controller being adapted to receive requests for data from users and respond to the requests by obtaining requested data; and means for setting navigational rules, enabling the web application to save a user's intended destination and subsequently recall that information to redirect the user back to the intended destination.

16. The system set forth in claim 15, wherein the means for setting navigational rules comprises means for storing the intended path.

17. The system set forth in claim 15, wherein the means for setting navigational rules comprises means for recalling the intended path.

18. A tangible machine readable medium, comprising:
code that is adapted to save a user's intended destination and subsequently recall that information to redirect the user back to the intended destination upon completion of the prerequisite.

19. The tangible machine readable medium set forth in claim 18, comprising a controller generator stored on the machine readable medium, the controller generator being adapted to provide the web application with the ability to receive requests for data from users and respond to the requests by obtaining requested data.

20. The tangible machine readable medium set forth in claim 18, wherein the navigational control logic comprises navigational rules for a portal name, a first path corresponding to initiation of the prerequisite, and a second path corresponding to completion of the prerequisite.

9. **EVIDENCE APPENDIX**

None.

10. **RELATED PROCEEDINGS APPENDIX**

None.